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Docket Management System  
U.S. Department of Transportation  
Room Plaza 401  
400 Seventh Street SW.  
Washington, DC 20590-0001

Docket number [FAA-2000-10910]

**CAPA's Comments regarding Notice of proposed rulemaking (NPRM).  
Collision Avoidance Systems**

To Whom It May Concern:

This commenter is a party with a vested interest in this NPRM both as members of the aviation community, employment with an all cargo carrier, and member of the traveling public.

I fully support the FAA's effort to rectify a long-standing oversight in the Collision Avoidance of air traffic. I would like to suggest though that you consider the following points in your final rule.

**Timeline:** When congress initially drafted legislation to make a Collision Avoidance System mandatory for all aircraft with 10 or more passenger seats, or weighing more than 33,000 pounds, a compliance date of Jan 1, 2000 was chosen. Unfortunately due to political reasons the bill was delayed and when it finally became law, the compliance date was changed to Jan 1, 2003. This date happens to also coincide with the date for mandatory equipage in several ICAO states. I feel that this is a realistic compliance and I urge the FAA to mandate it for all cargo carriers.

**Alternative Technology (ADS-B):** I enthusiastically support the FAA's intent to look forward and embrace the new technology of ADS-B. I have personally seen it in action during 2 Operational Evaluations in the Ohio Valley. However, I feel it important to have TCAS as the last ditch, stand alone, independent collision avoidance system as we move towards the Free Flight concepts.

Allen W. Groves  
A300 First Officer  
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